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June 11, 2021

VIA ECF

The Honorable Allyne R. Ross
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

Re: Irish v. Majestic GERP LLC et al., 18-CV-307 (JBW-JO)

Dear Judge Ross:

We represent defendants Majestic GERP LLC, Queens GERP LLC, and United Artists Theatre Circuit, Inc. (collectively, "Defendants") in the above-referenced action. In accordance with Your Honor's Order dated May 12, 2021, and in light of the events summarized below, we respectfully write to request a further extension of Defendants' time to complete the Accessibility Remediation set forth in the Stipulation of Remediation (Docket No. 33) from June 11, 2021 until August 10, 2021.

Although Defendants continue to make progress with respect to the remediation work, certain issues regarding the Theater's contractor and related vendors have continued to affect the completion of that work. Defendants have continued to confer with Plaintiff regarding those issues. In light of the foregoing, Defendants respectfully request a further extension of their time to complete the Accessibility Remediation from June 11, 2021 until August 10, 2021. This is Defendants' eleventh request for an extension of their time to complete the Accessibility Remediation, and Plaintiff consents to this request.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

A handwritten signature in blue ink, appearing to read "Evan B. Citron".

Evan B. Citron

cc: All counsel of record (by ECF)